

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MAJOR LEAGUE BASEBALL
PROPERTIES, INC. and CHICAGO CUBS
BASEBALL CLUB, LLC,

Plaintiffs,

v.

TOUSSIAINT STEVENS; *et al.*,

Defendants.

Civil Action No. 1:16-cv-09140

**PLAINTIFFS' SECOND MOTION FOR DEFAULT JUDGMENT AND PERMANENT
INJUNCTION AGAINST CERTAIN DEFENDANTS**

Pursuant to Federal Rule of Civil Procedure 55(b)(2), and in light of the Court's entry of default against Defendants Richard Jekel, Raymond Miller, Garvin Walker, James Pinkin Jr., and Thomas Russo on October 27, 2016 (ECF 79), Defendants Taha Maniya, individually and d/b/a E-Z Connections, Donald Simon, Jake O'Reily, Matthew Cole, Fred Fulton, Asezam Rahman, Fahiyim Ahmad Nasir, LaNita Cox, Rickey Lias Jr., Alfred Curry, individually and d/b/a National Team Sports, and Kyle Smith on November 3, 2016 (ECF 105), and Defendants Johnnie Carr, James Quitoni, James Lathom, Tyreak Rush, Angelo Lapalomento, William Shearin, Tyler Benard III, Philip Coleman, Edward Robinson, Jamir Branch, Bilal Walk, Vincent Riso, Dwan Pascall, Jibri Bost, Lamarre Johnson, Derek Truesdale, Jalen Hinton, Kenneth Joseph, Charles Simmons Jr., James Cines, Anthony Hopkins, James Wright, Anthony Simmon, Robert Walkers, John King, Tyrese Autrey, Darnell Simmons, Esteban Lopez, Theo Anthony Bishop, Ryan Rippetoe, Arthur Johnson, Craig Bay Jr., Anthony Dais, Jason Brison, Chad Hines, Martin Quattlebaum, Michael Huhn, Troy Brown, Pasquale Pedicini, Vaughn Waddle, Angel Villoda, Michael LaDale Jackson, Eddie Irizarry, Maurice Kelly, Geraldo Camara, and Bernard Thompson on November 16, 2016 (ECF 166) (collectively, the "Default

Defendants”), Plaintiffs Chicago Cubs Baseball Club, LLC and Plaintiff Major League Baseball Properties, Inc. hereby move the Court to enter the attached proposed order, directing the entry of a judgment, by default, in favor of Plaintiffs and against the Default Defendants for the legal and equitable relief found therein.

Dated: November 17, 2016

RILEY SAFER HOLMES & CANCELIA LLP

By: /s/ Brian O. Watson

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